

McCord Exhibit 4

MARCH, HURWITZ & DeMARCO, P.C.
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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AMERICAN FAMILY HOME INSURANCE
COMPANY, as Subrogee of Adrian Biesecker,

Plaintiff,

Docket No. 2:21-cv-04016-JDW

v.

MCLAREN AUTOMOTIVE, INC., and
KRAUSE FAMILY MOTORCARS, LLC,

Defendants.

**AMENDED ANSWERS OF DEFENDANTS, KRAUSE FAMILY MOTORCARS, LLC
TO PLAINTIFFS' FIRST SET OF INTERROGATORIES**

1. Since Krause's formation on August 1, 2016, a total of 25 vehicles have been sold or leased to customers who provided a Pennsylvania address. All of these sales were conducted by Krause at their Atlanta, Georgia dealership location. By way of further response, during this same period of time, Krause has leased or sold a total of 2,778 vehicles.

2. Please see response to Interrogatory No. 1.

3. Please see response to Interrogatory No. 1. Additionally, since its formation, Krause has done repairs on 16 vehicles for which the customer provided a Pennsylvania address. All service was performed by Krause at their Atlanta, Georgia dealership location. By way of further response, during this same period of time, Krause has done over 15,000 repairs on vehicles for customers who gave addresses that were not located in Pennsylvania.

4. Objection. Answering Defendant is uncertain as to what is meant by the term "from any sources or accounts located in Pennsylvania." Without waiving this objection and in the spirit

of discovery, Answering Defendant has produced records indicating the total gross sales generated from individuals who provided a Pennsylvania address to Answering Defendant.

5. Objection. Answering Defendant is uncertain as to what is meant by the term “from any sources or accounts located in Pennsylvania.” Without waiving this objection and in the spirit of discovery, Answering Defendant has produced records indicating the total gross sales generated from individuals who provided a Pennsylvania address to Answering Defendant.

6. None other than the present matter.

7. None other than Answering Defendant.

8. No.

9. No.

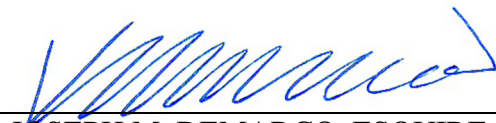
10. No.

11. Krause has on very rare occasions obtained a vehicle from a Pennsylvania based dealership, perhaps one vehicle in a 5-year period of time.

12. Objection. The information sought by this Interrogatory is beyond the scope of appropriate discovery in that it seeks irrelevant information not calculated to lead to the discovery of admissible information. In the spirit of discovery and without waiving this objection, Answering Defendant does business with PNC bank from its local branch in Atlanta, Georgia.

MARCH, HURWITZ & DeMARCO, P.C.

Dated: January 21, 2022



JOSEPH M. DEMARCO, ESQUIRE

KRISTEN E. LIZZANO, ESQUIRE

*Attorneys for Defendant, Krause Family Motorcars,
LLC*

VERIFICATION

I, Brandon Saszi, on behalf of KRAUSE FAMILY MOTORCARS, LLC, verify that the facts set forth in the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information and belief and that said statements are made subject to the penalties relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'B. Saszi', is written above a horizontal line.

ON BEHALF OF
KRAUSE FAMILY MOTORCARS, LLC

MARCH, HURWITZ & DeMARCO, P.C.
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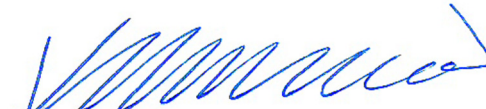
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CERTIFICATE OF SERVICE

I do hereby certify that on January 21, 2022, a true and correct copy of the foregoing
Amended Responses of Defendant, Krause Family Motorcars, LLC to Plaintiff's Interrogatories
was served via email upon the counsel listed below:

Patrick C. Timoney, Esquire
Devine Timoney Law Group
Devine Timoney Law Group
Veva 14, Suite 404
1777 Sentry Parkway West
Blue Bell, PA 19422
Counsel for Plaintiff

MARCH, HURWITZ & DeMARCO, P.C.



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